

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	MOTION FOR DISCLOSURE
)	OF GRAND JURY TRANSCRIPTS
ANTON JOSEPH LAZZARO,)	
)	
)	
Defendant.)	

The Defendant, Anton Lazzaro, by and through his undersigned attorneys, and pursuant to Rule 6(e)(3)(E) of the Federal Rules of Criminal Procedure; *Pittsburgh Plate Glass Co. v. United States*, 360 U.S. 395, 400 (1959) (permitting disclosure of grand jury transcripts when the defendant has a particularized need for the transcripts, including for purposes of cross examination preparation); *see also Dennis v. United States*. 384 U.S. 855, 868-75 (1966), respectfully moves the Court for an order permitting the inspection and copying of the entire transcript and minutes of the Grand Jury relating to the following:

1. All witnesses who testified before the Grand Jury, and whom the Government intends to call as witnesses at any pretrial hearing or at the trial of this case.
2. The testimony of any witnesses who testified before the Grand Jury and whom the Government does not expect to call as witnesses at the trial of this case, insofar as said testimony may be inconsistent with the testimony of any other witness before the Grand Jury, or inconsistent with statements known by the Government to have been made by any other individual at any time, or inconsistent statements made by the same individual at any other time.

3. The comments of any Grand Jurors with respect to the assertion by any defendant of constitutional privileges.

WHEREFORE, the Defendant prays that this Court enter an order directing that all of the requested materials be made available to the undersigned counsel and for such other and further relief as the interest of justice may require.

This motion is based upon the indictment, the records and files in the above-entitled action and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Respectfully submitted,

Dated: January 14, 2022

/s/Catherine Turner
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Dated: January 14, 2022

/s/Zachary Newland
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Attorneys for Mr. Lazzaro

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 14th day of January 2022.

/s/Catherine Turner
Catherine Turner